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2 Jesse J. Bair (admitted *pro hac vice*)

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7 *Special Insurance Counsel to*

*The Official Committee of Unsecured Creditors*

8  
9 **UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 In re

12 THE ROMAN CATHOLIC ARCHBISHOP  
OF SAN FRANCISCO,

13 Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

14 **MONTHLY PROFESSIONAL FEE**  
**STATEMENT FOR BURNS BAIR LLP**  
**FOR APRIL 2025**

15 **TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

16 **NOTICE IS HEREBY GIVEN** that Burns Bair LLP, special insurance counsel to the  
17 Official Committee of Unsecured Creditors (the “Committee”), hereby files its monthly professional  
18 fee statement for the period April 1, 2025 through April 30, 2025 (the “Fee Period”), pursuant to the  
19 *Order Establishing Procedures and Authorizing Payment of Professional Fees and Expenses on a*  
20 *Monthly Basis* (the “Compensation Order”), entered on October 16, 2023 [ECF No. 212]. The total  
21 fees and expenses incurred by Burns Bair LLP on behalf of the Committee for the Fee Period are as  
22 follows:

23

Period	Fees	Expenses	Total
24 April 1, 2025 through April 30, 2025	\$34,401.00 <sup>1</sup>	\$3,195.47	\$37,596.47
25 Net Total Allowed Payments this Statement 26 Period (80% of fees and 100% of expenses)	\$27,520.80	\$3,195.47	\$30,716.27

27 <sup>1</sup> Burns Bair will contribute ten percent of all fees it receives in this case on a final basis to a settlement trust that is  
28 approved as part of a plan of reorganization. As such fees are paid, Burns Bair will hold those funds in a trust account  
until a settlement trust is established through a plan of reorganization.

1 Attached hereto at **Exhibit 1** is Burns Bair's itemized billing statement for its fees and  
2 expenses billed during the Fee Period. Pursuant to the Compensation Order, the Net Total Allowed  
3 Payments detailed in the chart above shall be paid from funds held by the estate of the Debtor, The  
4 Roman Catholic Archbishop of San Francisco, unless an objection is filed with the Clerk of the  
5 Court and served upon Burns Bair LLP within *14 days after the date of service* of this monthly  
6 professional fee statement.

7 Dated: May 27, 2025

**BURNS BAIR LLP**

8  
9 By: /s/ Jesse J. Bair  
Jesse J. Bair

10  
11 *Special Insurance Counsel to the Official*  
12 *Committee of Unsecured Creditors*  
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# EXHIBIT 1

# Burns | Bair

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608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
Archbishop of San Francisco**

**Issue Date :** 5/20/2025

**Bill # :** 01934

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/10/2025	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re case developments and next-steps (.7);	0.70	\$630.00
4/16/2025	Brian Cawley	Participate in state court counsel meeting for insurance purposes (.5);	0.50	\$275.00
4/22/2025	Brian Cawley	Participate in state court counsel meeting for insurance purposes (.3); draft summary re key takeaways and outcome of same (.2);	0.50	\$275.00
<b>Totals for Committee Meetings</b>			<b>1.70</b>	<b>\$1,180.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/8/2025	Jesse Bair	Review fee examiner's preliminary report (.2); prepare for call with fee examiner re same (.3); participate in call with fee examiner re same (.5);	1.00	\$900.00
4/18/2025	Jesse Bair	Correspond with G. Brown and B. Horn-Edwards re monthly fee statement (.1);	0.10	\$90.00
4/18/2025	Brenda Horn-Edwards	Correspond with J. Bair re monthly fee statement (.1);	0.10	\$34.00
4/22/2025	Jesse Bair	Review fee examiner's consolidated report re 4th interim fee applications (.1);	0.10	\$90.00
4/23/2025	Brenda Horn-Edwards	Revise order approving Burns Bair fourth interim application (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
4/23/2025	Brenda Horn-Edwards	Lodge proposed order re Burns Bair fourth interim application with Court (.1);	0.10	\$34.00

4/23/2025	Jesse Bair	Review docket order approving interim fee applications (.1); review and edit proposed order approving same (.1); correspond with fee examiner and B. Horn-Edwards re same (.1);	0.30	\$270.00
4/24/2025	Jesse Bair	Correspond with B. Horn-Edwards and G. Brown re monthly fee statement (.1);	0.10	\$90.00
4/25/2025	Jesse Bair	Review and finalize Burns Bair monthly fee statement (.1); correspond with B. Horn-Edwards and G. Brown re same (.1);	0.20	\$180.00
4/25/2025	Brenda Horn-Edwards	Draft monthly fee statement and certificate of service (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
4/25/2025	Brenda Horn-Edwards	File and serve monthly fee statement (.2);	0.20	\$68.00
<b>Totals for Fee Applications</b>			<b>2.80</b>	<b>\$1,960.00</b>

### Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/1/2025	Karen Dempksi	Docket/calendar motion for late claim hearing (.1);	0.10	\$34.00
4/2/2025	Jesse Bair	Correspond with Committee professionals re outstanding insurance discovery from the Diocese (.1);	0.10	\$90.00
4/2/2025	Brian Cawley	Draft email memo to the Debtor providing summary of particular bates-ranges of insurance materials to be re-designated (.6);	0.60	\$330.00
4/4/2025	Jesse Bair	Review correspondence with B. Michael and the mediators re upcoming mediation session (.1);	0.10	\$90.00
4/5/2025	Timothy Burns	Review correspondence with PSZJ, the Committee, and the mediators re April mediation (.1);	0.10	\$112.00
4/6/2025	Jesse Bair	Review B. Michael correspondence re next mediation session (.1);	0.10	\$90.00
4/8/2025	Jesse Bair	Analysis re potential use of estimation for insurance purposes (.4);	0.40	\$360.00
4/8/2025	Jesse Bair	Review and respond to correspondence with the debtor and BB team re process for re-designation of debtor insurance policies (.1);	0.10	\$90.00
4/8/2025	Brian Cawley	Respond to state court counsel questions re particular debtor insurers (.3);	0.30	\$165.00
4/8/2025	Brian Cawley	Analyze orders on disclosure of IRB minutes and aggregate claim data (.3);	0.30	\$165.00

4/8/2025	Brian Cawley	Begin redacting potentially confidential information from debtor insurance policy materials as part of insurance re-designation project (1.9); correspond with J. Bair re same (.1);	2.00	\$1,100.00
4/9/2025	Brian Cawley	Continue redacting potentially confidential information from debtor insurance policy materials as part of insurance re-designation project (1.8);	1.80	\$990.00
4/9/2025	Brian Cawley	Revise and respond to correspondence with the debtor and Committee professionals re policy redactions and re-designation issues (.2);	0.20	\$110.00
4/9/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re insurance-related aggregate claim data (.1); review additional correspondence with the debtor and Committee professionals re process for re-designating debtor insurance materials (.1);	0.20	\$180.00
4/9/2025	Timothy Burns	Review multiple correspondence with the debtor and Committee professionals re use of insurance policies (.2);	0.20	\$224.00
4/9/2025	Timothy Burns	Prepare for conference with J. Stang (.1); participate in conference with J. Stang re insurance strategy (.7);	0.80	\$896.00
4/9/2025	Timothy Burns	Review correspondence with B. Michael re aggregate claims data (.1); correspond with J. Bair re same (.1);	0.20	\$224.00
4/10/2025	Timothy Burns	Review court order re late filed proof of claim (.1);	0.10	\$112.00
4/10/2025	Timothy Burns	Brief review of lift stay order (.1); participate in call with state court counsel re same (.1);	0.20	\$224.00
4/10/2025	Jesse Bair	Brief review re lift stay decision (.1);	0.10	\$90.00
4/10/2025	Brian Cawley	Respond to questions re policy document redactions from debtor counsel and analyze relevant policy documents in connection with same (.5);	0.50	\$275.00
4/10/2025	Brian Cawley	Analyze opinion on stay relief (.4);	0.40	\$220.00
4/11/2025	Timothy Burns	Participate in detailed conference with Committee professionals re case litigation, mediation, and overall case resolution and insurance strategy (2.1);	2.10	\$2,352.00
4/11/2025	Jesse Bair	Participate in part of detailed case strategy conference with PSZJ and T. Burns re upcoming mediation, ongoing litigation, potential next-steps, and overall Committee case strategy (2.0);	2.00	\$1,800.00
4/11/2025	Jesse Bair	Additional review of lift stay decision and order (.2);	0.20	\$180.00

4/13/2025	Brian Cawley	Review and respond to correspondence with the debtor and J. Bair re the debtor's responses to proposed production / redactions and potential replies to same (.4);	0.40	\$220.00
4/13/2025	Jesse Bair	Review debtor correspondence re ongoing issues re re-designation and production of debtor insurance materials (.1); review and respond to correspondence with B. Cawley re same, response to debtor, and next-steps (.2);	0.30	\$270.00
4/14/2025	Brian Cawley	Continue reviewing and redacting additional portions of debtor insurance materials consistent with revised parameters outlined by the debtor as part of insurance materials re-designation project (3.2);	3.20	\$1,760.00
4/15/2025	Brian Cawley	Finish reviewing and redacting additional portions of debtor insurance materials consistent with revised parameters outlined by the debtor as part of insurance materials re-designation project (2.7);	2.70	\$1,485.00
4/15/2025	Brian Cawley	Participate in conference with J. Bair re mediation strategy and next-steps (.2);	0.20	\$110.00
4/15/2025	Timothy Burns	Review B. Michael correspondence re various case developments (.1);	0.10	\$112.00
4/15/2025	Jesse Bair	Provide instructions to B. Cawley re ongoing project re re-designation of debtor insurance materials and related case strategy issues (.2);	0.20	\$180.00
4/15/2025	Jesse Bair	Participate in conference with B. Cawley re ongoing mediation negotiations (.2);	0.20	\$180.00
4/16/2025	Brian Cawley	Correspond with the debtor re revised debtor redacted policy materials (.2);	0.20	\$110.00
4/17/2025	Brian Cawley	Analyze new production from CNA and update coverage chart re same (1.1);	1.10	\$605.00
4/17/2025	Brian Cawley	Correspond with debtor insurance counsel re recent set of redactions for policy designations (.2);	0.20	\$110.00
4/17/2025	Brian Cawley	Respond to J. Bair request regarding revised claims chart (.2);	0.20	\$110.00
4/17/2025	Jesse Bair	Review correspondence with the debtor and PSZJ re claim reconciliation (.1); review correspondence from the debtor re CNA document production (.1);	0.20	\$180.00
4/18/2025	Jesse Bair	Participate in conference with B. Cawley re ongoing project re re-designation of debtor insurance materials (.1);	0.10	\$90.00
4/18/2025	Brian Cawley	Begin extracting relevant policy materials from confidential secondary evidence (2.7);	2.70	\$1,485.00
4/18/2025	Brian Cawley	Participate in call with debtor counsel re policy re-designation issues (.3);	0.30	\$165.00

4/22/2025	Brian Cawley	Analyze the Committee's complaint for declaratory relief in preparation for upcoming state court counsel meeting (.4);	0.40	\$220.00
4/23/2025	Brian Cawley	Continue redacting relevant materials from debtor insurance secondary evidence to permit public use of debtor insurance materials (2.0);	2.00	\$1,100.00
4/23/2025	Timothy Burns	Review B. Cawley's summary re outcome of state court counsel meeting (.1); review the Committee's Declaratory Judgment Complaint re Divisions (.4);	0.50	\$560.00
4/23/2025	Jesse Bair	Review B. Cawley summary re outcome of state court counsel meeting and next-steps (.1);	0.10	\$90.00
4/24/2025	Jesse Bair	Participate in portion of mediation session for insurance purposes (4.0); participate in post-mediation conferences re strategy with J. Stang and T. Burns (.6);	4.60	\$4,140.00
4/24/2025	Timothy Burns	Participate in mediation session for insurance purposes (4.6); participate in post-mediation conferences re strategy with J. Stang and J. Bair (.6);	5.20	\$5,824.00
4/28/2025	Timothy Burns	Review Debtor's ROR with respect to motion to enlarge re late filed claim (.2);	0.20	\$224.00
4/29/2025	Karen DempSKI	Docket/calendar adversary proceedings complaint (.1);	0.10	\$34.00
4/30/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re claims slotting and insurance analysis (.2);	0.20	\$224.00
4/30/2025	Jesse Bair	Review and edit claim and coverage charts requested by the mediators (.3); correspond with B. Michael re additional analysis needed in connection with same (.2); review revised version of claim and coverage charts requested by the mediators (.3); correspond with B. Michael re same (.1); review various correspondence with the mediators, Debtor, and PSZJ re same (.1); review the debtor's adversary complaint re declaratory judgment that the stay protects non-debtors (.3);	1.30	\$1,170.00
<b>Totals for Insurance Recovery Activities</b>			<b>40.10</b>	<b>\$31,261.00</b>

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<b>Total Hours and Fees</b>	<b>44.60</b>	<b>\$34,401.00</b>
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#### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
04/23/2025	United Airlines Inflight Wi-Fi, J. Bair (ORD-SFO)	\$8.00



04/23/2025	Hotel, J. Bair (2 nights)	\$852.00
04/23/2025	Hotel, T. Burns (2 nights)	\$852.00
04/23/2025	Taxi, J. Bair and T. Burns (airport to hotel)	\$68.00
04/23/2025	United Airlines Inflight Wi-Fi, T. Burns (ORD-SFO)	\$8.00
04/23/2025	United Airlines, J. Bair	\$131.59
04/23/2025	United Airlines, T. Burns	\$131.59
04/25/2025	Travel meal, T. Burns	\$15.21
04/25/2025	Uber, J. Bair and T. Burns (hotel to airport)	\$124.41
04/25/2025	Airport parking, T. Burns	\$23.50
04/25/2025	Airport parking, J. Bair	\$23.50
04/25/2025	Postage	\$1.29
04/25/2025	Delta Airlines, T. Burns (SFO-MSN, April 25)	\$478.19
04/25/2025	Delta Airlines, J. Bair (SFO-MSN, April 25)	\$478.19
<b>Total Expenses</b>		<b>\$3,195.47</b>

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	1.00	\$340.00	\$340.00
Brian Cawley	Associate	20.70	\$550.00	\$11,385.00
Jesse Bair	Partner	12.80	\$900.00	\$11,520.00
Karen Dempski	Paralegal	0.20	\$340.00	\$68.00
Timothy Burns	Partner	9.90	\$1,120.00	\$11,088.00

**Total Due This Invoice: \$37,596.47**

1 Timothy W. Burns (admitted *pro hac vice*)  
WI Bar 1068086

2 Jesse J. Bair (admitted *pro hac vice*)  
WI Bar 1083779

3 BURNS BAIR LLP

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8 *The Official Committee of Unsecured Creditors*

9 **UNITED STATES BANKRUPTCY COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

11 In re

12 THE ROMAN CATHOLIC ARCHBISHOP  
13 OF SAN FRANCISCO,

14 Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

**CERTIFICATE OF SERVICE**

15 I, Brenda Horn-Edwards, declare that I am employed in the County of Dane, State of  
16 Wisconsin. I am over the age of 18 and not a party to the within action. My business address is 10  
17 E. Doty Street, Suite 600, Madison, Wisconsin 53703.

18 On May 27, 2025, I served a true and correct copy of the **Monthly Professional Fee**  
19 **Statement for Burns Bair LLP for April 2025** in the manner stated below:  
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22 TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to  
23 controlling General Orders and LBR, the foregoing document was served by the court via NEF and  
24 hyperlink to the document. On **May 27, 2025**, I checked the CM/ECF docket for this bankruptcy  
case or adversary proceeding and determined that the participants on the attached Electronic Mail  
Notice List will receive NEF transmission at the email address stated.

<input checked="" type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in Dane County, Wisconsin, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.  The Honorable Dennis Montali United States Bankruptcy Court Northern District of California 450 Golden Gate Avenue, 16 <sup>th</sup> Floor San Francisco, CA 94102
<input checked="" type="checkbox"/>	(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached Service List at the email address stated.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on May 27, 2025, at Madison, Wisconsin.

/s/ Brenda Horn-Edwards

Brenda Horn-Edwards

## ELECTRONIC MAIL NOTICE LIST

Mary Alexander on behalf of Creditor Daniel Eichhorn  
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